UNITED STATES DISTRICT COURT	
NORTHERN DI	STRICT OF CALIFORNIA
OAKI	LAND DIVISION
IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION	Master File No. 07-CV-5944-JST
	MDL No. 1917
This Document Relates to:	STIPULATION AND [PROPOSED] ORDER RE: DISCOVERY SCHEDULE
ALL DIRECT PURCHASER ACTIONS ALL INDIRECT PURCHASER ACTIONS	Judge: Honorable Jon S. Tigar

Direct Purchaser Plaintiffs ("DPPs"), Indirect Purchaser Plaintiffs ("IPPs") and Defendants Irico Group Corporation and Irico Display Devices Co., Ltd. ("Irico" or the "Irico Defendants," collectively the "Parties"), by and through the undersigned counsel and pursuant to Federal Rule of Civil Procedure 16(b)(4) and Civil Local Rule 7-12, hereby stipulate as follows:

WHEREAS, the Court's Scheduling Order and Referral to Magistrate Judge for Settlement [ECF 5925] established the schedules for the DPP and IPP cases ("Scheduling Order");

WHEREAS, the Parties previously agreed to modify the existing schedule given the complications arising from the COVID-19 pandemic and to accommodate the good faith efforts of the parties, including a March 18, 2022 deadline to complete the depositions of Irico employees Su Xiaohua and Wang Zhaojie in Hong Kong, and the Court approved the stipulation [ECF No. 5980];

WHEREAS, the urgent COVID-19 situation in Hong Kong has precluded the depositions of Su Xiaohua and Wang Zhaojie from occurring prior to March 18, 2022;

WHEREAS, the Plaintiffs recently identified another Irico witness for deposition, Yan Yunlong, and Irico has agreed to produce this witness; and,

WHEREAS, the Parties agree that modifying the current discovery schedule would accommodate the Parties' efforts to complete these depositions and ensure the most efficient use of the Court's time and resources.

IT IS HEREBY STIPULATED AND AGREED by and between counsel for DPPs, IPPs and the Irico Defendants that good cause exists to modify the DPP and IPP schedules as follows:

- 1. The March 18, 2022 deadline for the depositions of Su Xiaohua and Wang Zhaojie is hereby VACATED;
- 2. The depositions of Su Xiaohua, Wang Zhaojie, and Yan Yunlong shall be completed by no later than May 31, 2022;
- 3. Plaintiffs shall propound any additional discovery and take any additional depositions with sufficient time to close Fact Discovery on August 1, 2022; and,
- 4. This Stipulation and Order does not modify any other dates in the Scheduling Order except as stated above.

1	PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO	
2	ORDERED.	
3		
4	Dated: March 18, 2022	
5	HONORABLE JON OTIGAR UNITED STATES DISTRICT JUDGE	
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

1	Dated: March 17, 2022	
2		
3	/s/ R. Alexander Saveri R. Alexander Saveri (173102)	/s/ John M. Taladay John M. Taladay (pro hac vice)
4	Geoffrey C. Rushing (126910) Cadio Zirpoli (179108)	Evan J. Werbel (<i>pro hac vice</i>) Thomas E. Carter (<i>pro hac vice</i>)
5	Matthew D. Heaphy (227224) SAVERI & SAVERI, INC.	Andrew L. Lucarelli (<i>pro hac vice</i>) BAKER BOTTS LLP
6	706 Sansome Street	700 K Street, N.W.
7	San Francisco, CA 94111 Telephone: (415) 217-6810 Facsimile: (415) 217-6813	Washington, D.C. 20001 (202) 639-7700 (202) 639-7890 (fax)
8 9	Lead Counsel for Direct Purchaser Plaintiffs	Email: john.taladay@bakerbotts.com evan.werbel@bakerbotts.com tom.carter@bakerbotts.com drew.lucarelli@bakerbotts.com
10		Attorneys for Defendants Irico Group Corp.
11	/s/ Mario N. Alioto Mario N. Alioto (56433)	and Irico Display Devices Co., Ltd.
12	Joseph M. Patane (72202) Lauren C. Capurro (241151)	
13	TRUMP, ALĪOTO, TRUMP & PRESCOTT LLP	
14	2001 Union Street, Suite 482 San Francisco, CA 94123	
15	Telephone: 415-563-7200 Facsimile: 415- 346-0679	
16	Email: malioto@tatp.com jpatane@tatp.com	
17	laurenrussell@tatp.com	
18	Lead Counsel for the Indirect Purchaser	
19	Plaintiffs	
20		
21		
22		
23		
24		
25		
26		
27		
28		